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WEST ORANGE, NEW JERSEY

Honourable Claire C. Ceechi,
Judge, US District Court
District of New Jersey
Newark, NJ 08608

January 15th, 2018

Re: Michael A. D'Antonio v. Borough of Allendale et al, 2:16-cv-00816- (CCC)

Dear Judge Ceechi:

As you are aware, this firm represents the plaintiff in the above-referenced action, and I am the attorney of record for the plaintiff for this matter.

I am writing in response to the defendants, Richard Epstein's letter on this Martin Luther King, Jr. day holiday (which is very offensive to me as an African American, particularly since Mr. Epstein was aware of the fact that this Court had set tomorrow as the date which it will make its determination regarding the remaining defendants' motions to dismiss, and since Mr. Epstein was also aware of the fact that the plaintiff had filed his opposition last week), in response to the plaintiff's omnibus opposition to the defendants' motions to dismiss the plaintiff's Second Amended Complaint on the

basis that his name is only mentioned once as an individual in the opposition. However, the plaintiff's opposition mentions the issue regarding the improper foreclosure, the improper sale, the failure to carry out the Full Writ of Possession, and the failure to properly name the true owner of the property which the plaintiff to build affordable housing throughout his opposition. Moreover, the plaintiff makes mention of the places in his Second Amended Complaint where the plaintiff's arguments relate to his Second Amended Complaint which includes paragraphs regarding the actions of Richard Epstein, including paragraphs 14, 26

Please note that the plaintiff's omnibus opposition notes at its inception that the defendants acted in concert and also refers to various pages in his Second Amended Complaint which specifically refers to the particular actions of each defendant, including Richard Epstein, as their actions relate to the various claims in the plaintiff's Second Amended Complaint.

Plaintiff notes in his opposition that the defendant, Richard Epstein, failed to follow the proper procedures for foreclosures and sales. Plaintiff notes in his Second Amended Complaint that the defendant Richard Epstein, failed to fully carry out the Full Writ of Possession, NJ In Rem tax Law. Plaintiff connected these actions in his opposition by noting that the defendant, Richard Epstein, acted in concert with the Bergen County Sheriff's Department, the Passaic River Coalition, the Borough of Allendale, and the other remaining defendants to deny the plaintiff his Due Process right by failing to follow the proper procedures for foreclosures and sales, and by failing to follow the proper procedures for NJ In Rem Tax Law, the Equal Protection Clause in relation to buyers of African, Latino, and Native American descent, and regarding the Full Writ of Possession.

It is therefore, plaintiff's request that all of the remaining defendants, including, Richard Epstein's, motions for dismissal be denied as the plaintiff has stated claims upon which relief may be granted against all of the remaining defendants, including, Richard Epstein; the plaintiff has made a plain and short statement regarding the basis for his claims; the plaintiff has established standing to sue; and the plaintiff has established that this Court has subject matter jurisdiction.

Sincerely,

s/s Antoinette M. Wooten, Esq.